

U.S. District Judge Benjamin H. Settle

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

ADRIAN DAMON SIMS, an individual,

Plaintiff,

vs.

CITY OF LAKEWOOD, WASHINGTON, a
political subdivision of the State of
Washington; OFFICER JAMES SYLER, a
City of Lakewood Police Officer; and DOES
1 through 5, inclusive,

Defendants.

NO. 3:20-cv-06201-BHS

DEFENDANTS' DISCLOSURE OF EXPERT
WITNESS

COME NOW Defendants, by and through their attorneys, Mary E. Robnett, Pierce
County Prosecuting Attorney, and Frank A. Cornelius, Deputy Prosecuting Attorney, and by way
of disclosure pursuant to FRCP 26(a)(2), disclose the following expert witness:

1. Ron Pace
Canyon Crest K9 Training Center
4515 Vickery Ave. E. Tacoma, WA
(253) 926-9200
Email: ronpace@canyoncrestk9.com

Mr. Pace will testify concerning police dog handling practices and the use of force
exercised during the October 12, 2017, encounter with Adrian Sims. Mr. Pace will opine, as
stated in his report, that the actions of Officer James Syler and use of Police Dog K9 Rock were

1 within the standard of care.

2 Mr. Pace's expertise is based on his knowledge and experience in dog training and
3 handling as further detailed in his resume/biographical information. Mr. Pace's fee for services
4 rendered is \$300.00 per hour.

5 Attached as Exhibit A is a report authored by Ron Pace and his resume/biographical
6 information.

7 DATED this 6th day of December, 2021.

8 MARY E. ROBNETT
Prosecuting Attorney

9 s/ FRANK A. CORNELIUS
10 FRANK A. CORNELIUS, WSBA # 29590
Pierce County Prosecutor / Civil
11 955 Tacoma Avenue South, Suite 301
Tacoma, WA 98402-2160
12 Ph: 253-798-6514 / Fax: 253-798-6713
frank.cornelius@piercecountywa.gov

13 **CERTIFICATE OF SERVICE**

14 On December 6, 2021, I hereby certify that I electronically delivered the foregoing
15 DEFENDANTS' DISCLOSURE OF EXPERT WITNESSES to the following attorney of record:

- 16 • **Stephen J Plowman:** sjplowmanlaw@gmail.com
17

18 s/ NADINE BRITTAIN
NADINE BRITTAIN
19 Legal Assistant
Pierce County Prosecutor's Office
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955 Tacoma Avenue South
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22 nadine.christina-brittain@piercecountywa.gov
23
24

EXHIBIT A

P.C. K9 Bite Case

My name is Ron Pace and my background is attached. I have been asked by the P.C. Prosecutors Office to review documents of Adrian Damon Sims vs City of Lakewood and Officer Syler and K9 Rock.

In preparation of this report, I reviewed the following materials: Complaint; Minute Order Setting Jury Trial and Pretrial Dates; Incident Report 1717802052.1; Incident Report 1718202135.1; Incident Report 1728501098.1 Incident Report 1728501098.2; Incident report 1728501098.3; injury photographs; September 28, 2021, deposition transcript of Adrian D. Sims.

This to me is a typical building search that was announced by Officer Syler and K9 Rock that he would be sent in if the suspect Sims does not give up and come out. He refused to give up and come out, so K9 Rock was deployed as a safety issue to locate and apprehend the suspect. As K9 Rock located the suspect and made contact with him it sounds like the suspect attempted to fight with the commissioned Police Dog in which Rock then would escalate his job to apprehend and sub doo the suspect.

This to me looks like a typical apprehension by a Police K9 that meets the standard of care.

Sincerely,

Ron Pace

Canyon Crest K9 Training Center

Ron Pace professional dog trainer/instructor since 1977 is the author of "Who's the Boss" a step by step guide for any dog owner that wants to have a better relationship with his dog and is the owner of Canyon Crest K9 Training Center in Tacoma WA. Canyon Crest K9 was awarded by the Better Business Bureau the 2010 Torch Award for Western Washington's Small Business of the Year. He has produced numerous dog trainer/instructors around the world with his Trainer/Instructor program. In 2011 he was nominated as Hero of the Year Award American Red Cross for his K9 CPR rescue of Sugar the Boxer that went viral. He was Voted Best Dog Trainer South Sound Magazine in 2011 and Evening Magazine Best of Washington Best Dog Trainer 2012. He was an Instructor for the Washington State Police K-9 Association and set up and trained law enforcement K9 programs for departments including City, County, State, Federal and Tribal agencies. He was the first civilian trainer to be contracted to search for narcotics in WA State Schools. In 2009 he started Dogabetics to provide service dogs and training for Type One Diabetics using live scent through breath and skin to alert to low and high blood sugars. He was the first to bring service dogs into Oregon and Washington State Public Schools. In 2009 he received the Local Hero of the Year Award Juvenile Diabetes Research Foundation (J.D.R.F.). FOX NEWS, CNN,

CBS, NBC and many others including National Syndicated programs called “Wild About Animals” and WHADUYADO” on the FOX Network JOETV have aired stories about him. He makes many speaking engagements such as Rotary, Kiwanis, Humane Society’s, Women’s groups, National Boarding Association. He served as an Executive Board Member for the Tacoma Pierce County Humane Society from 2010-2015.